

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

EDWIN H. STIER, ESQ., AS WIND DOWN  
TRUSTEE FOR MLS BERKOWITZ  
INVESTMENTS, LLC,

Plaintiff,

vs.

DIEGO POSSEBON, et al.,

Defendants.

CASE NO. 3:24-CV-04647-ZNQ-RLS

**STIPULATION AND ORDER**

**IT IS HEREBY STIPULATED AND AGREED**, by and between Calcagni & Kanefsky, LLP, counsel for Plaintiff Edwin H. Stier, Esq., as Wind Down Trustee for MLS Berkowitz Investments, LLC, and Archer & Greiner, P.C., counsel for Defendant Parag Diamonds Inc. d/b/a Paramount (“Paramount”), that the time within which Paramount may file, move or otherwise respond to Plaintiff’s Complaint shall be extended from October 16, 2024 to November 6, 2024.

**IT IS HEREBY FURTHER STIPULATED AND AGREED THAT** this Stipulation may be executed in one or more counterparts, each of which will be deemed an original, but all of which will be deemed one instrument, and that facsimile or electronic transmitted signatures shall be deemed to be originals.

**CALCAGNI & KANEFSKY, LLP**

By: Philip Morrow

Calcagni & Kanefsky, LLP  
1085 Raymond Boulevard, 14<sup>th</sup> Floor  
Newark, NJ 07102  
862-397-1796  
philipmorrow@ck-litigation.com  
Attorneys for Plaintiff

**ARCHER & GREINER, P.C.**

By: Michael J. Lauricella

Archer & Greiner, P.C.  
21 Main Street – Suite 353  
Hackensack, New Jersey 07601  
201-342-6000  
mlauricella@archerlaw.com  
Attorneys for Defendant

Dated: October 14, 2024

Dated: October 14, 2024

**SO ORDERED:**

\_\_\_\_\_  
Hon. Rukhsanah L. Singh, USMJ

Dated: \_\_\_\_\_, 2024